

JUDGE SWAIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

08 CV 3977

MAERSK LINE,

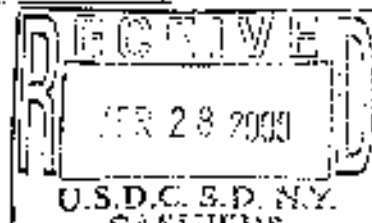
Plaintiff,

- against -

CHAKKO INTERNATIONAL,
CHUKWUDI CHIDUME, and
GERALD CHIDUME,

Defendants.

CIVIL COMPLAINT
IN ADMIRALTY



Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES, as and for its Complaint against
defendants CHAKKO INTERNATIONAL, CHUKWUDI CHIDUME, and
GERALD CHIDUME, in personam, in a cause of action civil and maritime, alleges
upon information and belief;

1. This is an admiralty and maritime claim within the meaning of Rule
9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of
1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 26 of the Bill of
Lading.

2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and
still is a corporation duly organized and existing under the laws of the State of
Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte,
NC 28209.

3. Upon information and belief and at all times hereinafter mentioned,
defendants had and now have the legal status and place of business as set forth in
Schedule A.

4. On or about the date and at the port of shipment stated in
Schedule A, certain goods were delivered to plaintiff to be carried to the ports of
destination and at the agreed charges to be paid by defendants pursuant to
plaintiff's published tariff, all as set forth in Schedule A.

5. Thereafter, the goods were carried to the ports of destination and delivered to the consignee and/or its agents.

6. Plaintiff has performed all duties and obligations required to be performed by plaintiff.

7. Defendants have failed and refused and continue to fail and refuse to remit payment of \$6,397.00, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$6,397.00 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendants citing them to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York
APRIL 25, 2008

LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

By



Albert J. Avallone - AA1679
Attorneys for Plaintiff
MAERSK LINE
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SCHEDULE A

I. Defendant's status & address:

A. Upon information and belief and at all times hereinafter mentioned, defendant CHAKKO INTERNATIONAL was and still is an unincorporated entity doing business in the State of Alabama, with offices and a place of business at 1501 Mitchell Court, Opelika, AL 36801.

B. Upon information and belief and at all times hereinafter mentioned, defendant CHUKWUDI CHIDUME was and still is a natural person and resident of the State of Alabama, resideing at 1501 Mitchell Court, Opelika, AL 36801, and is the co-owner defendant CHAKKO INTERNATIONAL.

C. Upon information and belief and at all times hereinafter mentioned, defendant GERALD CHIDUME was and still is a natural person and resident of the State of Alabama, resideing at 1501 Mitchell Court, Opelika, AL 36801, and is the co-owner defendant CHAKKO INTERNATIONAL.

II. Details of shipment(s):

1. Bill of Lading No. 511583341, dated January 9, 2007, from Charleston to Apapa on the Vessel MAERSK DHAKA, one (1) forty-foot container SAID TO CONTAIN: 2 MACK TRUCKS, at the applicable tariff charge of \$6,397.00 (Exhibit A).

III. Total Amount Due: \$6,397.00



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None of the above. Available only when document sent as electronic Transport ML (see clause 5)

EXHIBIT "A"

Port & Cargo	Rate	Unit	Currency	Amount	Total
Master Documentation Proce:	25.00	Per Bill of Lading	USD	25.00	
Port Security Charge	5.00	Per Container	USD	5.00	
Special Equipment Surcharge	2500.00	Per Container	USD	2500.00	
Carrier Security Charge	8.00	Per Container	USD	8.00	
Total: NGN			NGN		56330.00
Total: USD			USD	5397.00	